United States District Court
Southern District of Texas
Corpus Christi Division

Bobbie Lee Havenkamp
Plaintiff

vs.

Dr. Owen Murray, et al
Director of CMHC Policy
UTMB
              Defendants

Civil Action
2:17-CV-18

Motion to Lift the
Protective Order.

To the Honorable Judge of Said Court,
                              Now Comes,
Ms Bobbie AKA the Plaintiff in the above
styled civil Action and Asked for the
protective order to be lifted and the Defendants
order to answer the Civil Action

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Argument

Your Honor, the Plaintiff requests that the Protective Order be lifted and is moot because of the following argument.

It is well established that the Civil Action began in 2017 and has bounced around several issues unrelated to the central issue of Equal Protection for Texas Transgenders in prison that involves adequate Medical Care for Gender Dysphoria.

Limited Discovery revealed that it is the ideologies of Dr. Owen Murray, the CMHCC and policys created by them that has denied Equal Protection of Medical Care for Gender Dysphoria.

Years ago in a follow-up examination following thyroid surgery, a female Doctor from Holland entered the room, notebook in hand, never looked up and said, "HAVERKAMP, that's German. My grandmother and mother suffered under the Nazi Heel".

The Plaintiff, "I'm American, we had Haverkamps in Patton Third Army. If you hadn't of Blown the dikes we would of gotten there sooner".

(2)

The Doctor, "The Nazi's bleed the dikes"!!

Your Honor, the doctors did a Freudward Slip, it wasn't her intentions to discuss the 5 ideologies of different nations' that Affected her family. The doctors apology was Accepted and we moved on.

The example is on point, the jury will be faced with ideologies of Dr. Murray and others. The entire workings for the treatment of Gender Dysporia operate under a single policy G-51.11.

The 5th Circuit in Gibson, supra page 5 made it a point to point out there is dispute if the Policy forbids sex-reasignment surgery or is merely silent about it, doctors have denied Gibson's request because the Policy does not designate "sex-reassignment .... as part of the treatment protocol for Gender Identity Disorder"

Your Honor, Dr. Murray is playing a "Cat and Mouse" game, basily when you have two different interpertations of a Medical Policy — there is no Medical Policy.

As the policy stands, it is for public consumption, yet in reality we have a

policy that is open to legal action for inadequate medical care for Gender Dysphoria.

Your Honor, the protective order can safely be lifted, we have all the Defendants in one neat package— Dr. Murray, the CMHCC with the policy's they approved.

In reality, when Doctors won't prescribe SRS or Significant Relief because of policy, then we are at the very correct Defendants where the inadequate Medical treatments stem from.

The Defendants really have no more legal excuses to delay answering the Civil Action and we arrive at where B-51.11 is the issue.

The Plaintiff concedes that expert testimony will be need for the jury but everything remains in house with a very narrow group of Defendants

Your Honor, the protective order should be lifted and the Civil Action answered.

So Prays the Plaintiff
Ms Biltmore
June 7, 2021

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Certification of Service.

Your Honor, this was not served on Corbello in the Texas Attorney Generals Office.

The Plaintiff will assure the Court the longer Corbello dosen't have to answer the civil Action, it serves her purpose of delay.

So Prays the Plaintiff
Mrs Bobbie

6-7-2021